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Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION

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ADRAIN ORTIZ and  
HEATHER ORTIZ

Debtor.

CASE NO. 19-13660

Chapter 13

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**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Michael J. McCrystal, Attorney for the Movant, has filed an Motion to Avoid the Judicial Lien of Juan Turull.

*Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (if you do not have an attorney, you may wish to consult an attorney.)*

1. If you do not want the Court to grant the relief sought in this motion or if you want the Court to consider your views on this Motion, then on or before September 4, 2019, you or your attorney must do all of the following  
(A) file an answer explaining your position at:

Clerk, United States Bankruptcy Court for  
The Eastern District of Pennsylvania  
400 Washington Street, Third Floor  
The Madison Building  
Reading, PA 19601

If you mail your answer to the Clerk's Office for filing, you must mail early enough so that it will be received on or before the date stated above

(B) Mail a copy to the Movant's Attorney:

Michael J. McCrystal, Esquire  
151 Main Street, STE A  
Emmaus, PA 18049  
(610) 262-7873  
(610) 262-2219 (facsimile)

(C) Mail a copy to :

Office of the United States Trustee  
833 Chestnut Street  
Suite 500  
Philadelphia, PA 19107

Scott Waterman, Esquire  
2901 St. Lawrence Avenue  
PO Box 4010  
Reading, PA 19606

2. If you or your attorney do not take the steps described in 1(A) and 1(B) above and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
3. A hearing on the Motion is scheduled before the Honorable Eric L. Frank on September 12, 2019 at 11:00 AM in Courtroom number 1, United States Bankruptcy Court for the Eastern District of Pennsylvania, 400 Washington Street, The Madison Building, Reading, PA 19606-4010
4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you, if you request a copy from the attorney named in paragraph 1(B).
5. You may contact the Bankruptcy Court Clerk's Office at 610 208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

/s/ Michael J. McCrystal  
Michael J. McCrystal, Esquire